



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 6, 2021

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Application granted. The initial pretrial conference is hereby adjourned until July 23, 2021 at 3:00 p.m.

SO ORDERED.

Hon. Ronnie Abrams
April 7, 2021

Re: *Hu v. Wolf, et al.*, No. 21 Civ. 88 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Refugee/Asylee Relative Petition (Form I-730). On behalf of the government, I write to respectfully request an on-consent two-month extension of time for the government to respond to the complaint (*i.e.*, from May 12 to July 12, 2021) and to adjourn the May 21, 2021 conference.

The extension and adjournment are requested because USCIS has issued interview notices regarding the Form I-730 (as well as a related Application to Register Permanent Residence or Adjust Status (Form I-485)) for May 10, 2021. The additional time will thus allow USCIS to conduct the interviews and determine next steps, including potentially taking adjudicative action, which could render this case moot. If the Court grants the request, the parties respectfully request that the initial conference be rescheduled to the week of July 19, 2021, or thereafter. This is the first request for an extension of the government’s time to respond to the complaint and the second request to adjourn the initial conference.¹ The plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)

¹ On March 18, 2021, the government requested that the March 26, 2021 initial conference be adjourned in light of the May 12 date for the government to respond to the complaint. *See* ECF No. 8. The Court granted the request. *See* ECF No. 9.